Confirmation No.: 3159
Due Date: September 21, 2004

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:	)	
	)	
Inventors: Daniel Lee Thompson et al.	)	Examiner: Te Y. Chen
	)	
Serial #: 09/939,847	)	Group Art Unit: 2171
	)	
Filed: August 27, 2001	)	Appeal No.: _____
	)	
Title: STAGED STYLIZATION IN MULTIPLE TIERS	)	

BRIEF OF APPELLANTS

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

In accordance with 37 CFR §41.37, Appellants hereby submit the Appellants' Brief on Appeal from the final rejection in the above-identified application, in triplicate, as set forth in the Office Action dated April 21, 2004.

Please charge the amount of $330 to cover the required fee for filing this Appeal Brief as set forth under 37 CFR §41.37(a)(2) and 37 CFR §41.20(b)(2) to Deposit Account No. 50-0494 of Gates & Cooper LLP. Also, please charge any additional fees or credit any overpayments to Deposit Account No. 50-0494.

G&C 30566.129-US-01

1

I.   REAL PARTY IN INTEREST

The real party in interest is Autodesk, Inc., the assignee of the present application.

II.   RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences for the above-referenced patent application.

III. STATUS OF CLAIMS

Claims 1-36 are pending in the application.

Claims 1-24 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Appellants regard as the invention.

Claims 1-36 were rejected under 35 U.S.C. §102(e) as being anticipated by Helgeson et al., U.S. Patent No. 6,643,652 (Helgeson).

All of the above rejections are being appealed.

IV.   STATUS OF AMENDMENTS

Subsequent to the final rejection, no claims have been cancelled, amended, or added.

V.   SUMMARY OF CLAIMED SUBJECT MATTER

Data is stored in databases in a raw form. For example, information for a door may provide geometric information and/or text (for a bill-of-materials application). In another example, height data for a terrain map may be stored in the form of (x,y) coordinates. (See page 3, lines 6-21). However, such data may be presented/visualized to the user in various ways depending on the application's requirements (see page 3, lines 22-23).

Independent claims 1, 13, and 25 are generally directed to the ability to stylize data in discrete portable steps (see page 5, line 11-page 6, line 6). As used in the claims and set forth in the specification, "stylization" refers to the process wherein data is transformed from its pure/raw form to the final presentation desired by an application (see page 3, line 22- page 4, line 2). The portability of the stylization process (as claimed) allows stylization to be spread across multiple

G&C 30566.129-US-01

2

computers or tiers in a client-server environment (see page 5, line 11-page 6, line 6).

The independent claims initially provide for obtaining a domain object (see page 17, lines 20-23), Fig. 2, item 202, and Fig. 3, step 300. The domain object 202 provides an object representation of data stored in a database 102 for a domain entity (see page 17, lines 21-23). In this regard, as used in the specification, a domain entity represents a type of industry (see page 11, lines 10-23). For example, a domain entity may comprise a mechanical domain entity (see claims 10, 22, and 34 and page 11, lines 13-15), a architecture, engineering, and construction (AEC) domain entity (see claims 11, 23, and 35 and page 11, lines 13-15), and/or a geographic information system (GIS) domain entity (see claims 12, 24, and 36 and page 11, lines 13-15).

A first portable stylization process provides the ability to stylize the data in the domain object 202 into an application object 206 (see page 12, lines 12-13; page 18, lines 8-13; Fig. 2A, Fig. 3, step 308). As claimed, the application object 206 is an object representation of the data in the domain object that is relevant for a particular computer application (see page 18, lines 8-13).

Another portable stylization process (referred to in the claims as a second portable stylization process) then stylizes the application object 206 into a presentation object 210(see page 18, line 14-page 19, line 8; Fig. 2B; Fig. 3, step 308). The presentation object 210 is an object representation that encapsulates a visual appearance of the data in the application object 206 (see page 18, line 22-page 19, line 1).

The claims then provide for providing the presentation object 210 for viewing the data in the encapsulated visual appearance specified (see page 18, line 22-page 19, line 8; page 25, lines 11-14).

Thus, with the two portable stylization processes and the three different objects (i.e., the domain object 202, application object 206, and presentation object 210), stylization is broken up into multiple discrete parts that provides considerable flexibility.

Dependent claims 3, 5, 15, 17, 27, and 29 all refer to the use of a stylization agent object 110 and a stylization context 204. In claims 3, 15, and 27, the stylization agent object stylizes 110 the application object 206 for a domain object 202 based on the stylization context 204. Further, the stylization context 204 identifies only the data relevant for the particular computer application (i.e., for the application object 206). Similarly, claims 5, 17, and 29 provide for a stylization agent object

3

110 stylizing a presentation object 210 from the application object 206 based on the stylization context 204. Further, the stylization context 204 identifies a visual appearance for the data in the application object 206. (See page 18, line 8 – page 19, line 8).

Dependent claims 4, 16, and 28 further limit the application object 206 such that the application object 206 comprises business logic that provides functionality for a particular application (see page 18, lines 10-11).

Dependent claims 6, 18, and 20 provide for yet another object – a stylizer object (see page 19, lines 1-2). These dependent claims provide further specific limitations with respect to the stylizer object. The stylizer object has a data object that is either the domain object 202 or the application object 206 (see page 15, lines 9-12, lines 19-22). Additionally, the stylizer object has a stylization context object that has a stylization context 204 (se page 16, line 15-page 17, line 4). Further, the stylizer object has a stylization agent 110 and a mapping of the stylization agent 110 to a paired index of data objects and stylization context objects (see page 17, lines 5-14). In addition, the stylizer object has a stylize method that invokes the appropriate stylization agent 110 based on the mapping (see page 17, lines 13-14).

Dependent claims 7, 19, and 31 further limit claims 6, 18, and 20 and provide that the paired index is a 2D array of stylization agents indexed by a data object class and a stylization context (see page 16, lines 3-7).

Dependent claims 8, 9, 20, 21, 32, and 33 provide the ability to cache the application object and presentation object (see Fig. 3, steps 310 and 318; page 18, lines 12-13, page 19, lines 7-8).

As stated above, dependent claims 10-12, 22-24, and 34-36 provide further limitations with respect to the particular domain entity. In this regard, these claims provide for a mechanical domain entity, an AEC domain entity, and a GIS domain entity (see page 11, lines 13-15).

VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-24 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Appellants regard as the invention.

Claims 1-36 stand rejected under 35 U.S.C. §102(e) as anticipated by Helgeson et al., U.S.

G&C 30566.129-US-01

4

Patent No. 6,643,652 (Helgeson).

VIII. ARGUMENT

A. The Rejections Under 35 U.S.C. 112 Should be Reversed

On page (2) of the Office Action, claims 1-24 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Appellants regard as the invention. Specifically, the Office Action provides that claims 1 and 13 fail to provide the link/mapping of the claimed a first, a second portable stylization processes and the claimed a second, a third computer systems and therefore the claims are indefinite.

MPEP 2172.01 provides:

> In addition, a claim which fails to interrelate essential elements of the invention as defined by applicant(s) in the specification may be rejected under 35 U.S.C. 112, second paragraph, for failure to point out and distinctly claim the invention. See *In re Venezia*, 530 F.2d 956, 189 USPQ 149 (CCPA 1976); *In re Collier*, 397 F.2d 1003, 158 USPQ 266 (CCPA 1968). But see *Ex parte Nolden*, 149 USPQ 378, 380 (Bd. Pat. App. 1965) ("[I]t is not essential to a patentable combination that there be interdependency between the elements of the claimed device or that all the elements operate concurrently toward the desired result"); *Ex parte Huber*, 148 USPQ 447, 448-49 (Bd. Pat. App. 1965) (A claim does not necessarily fail to comply with 35 U.S.C. 112, second paragraph where the various elements do not function simultaneously, are not directly functionally related, do not directly intercooperate, and/or serve independent purposes.).

The rejection fails to cite any MPEP section as the basis of the rejection. Accordingly, Appellants assume that the above cited section sets forth the grounds for the rejection provided in the Office Action. Appellants note that the MPEP provides that the elements do NOT have to be directly functionally related, nor do they have to directly intercooperate.

In view of the above, Appellants traverse the rejection under 35 USC §112, second paragraph.

In addition, with respect to claim 1, the first portable stylization process stylizes data of a domain object into an application object. The second portable stylization process stylizes the data of the application object (from the first portable stylization process) into a presentation object. Accordingly, the application object from the first portable stylization step is used in the second portable stylization process. Such a common application object clearly provides a sufficient link/mapping between the claim elements.

G&C 30566.129-US-01

5

Similar to claim 1, claim 13 provides for storing an application object in the memory of a second computer system. The application object is then stylized into a presentation object which is stored in the memory of a third computer system. Thus, the different computer systems are linked by the stylization between the various objects and the storage of the results in respective memories of the computer systems.

In view of the above, Appellants respectfully request that the rejections under 35 USC §112 be reversed.

B.   Independent Claims 1, 13, and 25 are Patentable Over the Cited Art

On page (3) of the Office Action, claims 1-36 were rejected under 35 U.S.C. §102(e) as being anticipated by Helgeson et al., U.S. Patent No. 6,643,652 (Helgeson).

Specifically, independent claim 13 was rejected as follows:

> As to claim 13, Helgeson et al. (hereinafter referred as Helgeson) discloses a system as claimed by applicant for stylizing data (or transform data) [e.g., see Abstract, lines 3-9; col. 2, lines 51-67]) in a computer network system [e.g. see, Fig. 1], comprising:
>
> a) an objected-oriented computer system having memory and a data storage device coupled thereto [e.g., see 211, 209, 217, 219, 221, 223, Fig. 2; col. 5, lines 13-41];
>
> b) a domain object stored in the memory of a first computer system, the domain object comprising an object representation of data stored in a database for a domain entity [e.g. the business object of the fgr-dd-class which stored in the meta-data store as a database table (as shown at col. 14, 2a. The Meta-data Store section) of a business Development Kit (BDK) application server computer system (e.g. col. 13, lines 10-18)];
>
> c) a first portable stylization process [the Platform 501 processing, Fig. 5 and associated texts starting at col. 6, line 26 at seq.] configured to stylize the domain object into an application object [e.g., the BDK (519), Fig. 5 and associated text starting at col 6, line, 32 at seq.] wherein the application object is stored in the memory of a second computer system [e.g., the platform 501, Fig. 5], the application object comprising an object representation of the data in the domain object that is relevant for a particular computer application [e.g., col. 6, lines 32-60];
>
> d) a second portable stylization process [e.g., WDK server processing (523), Fig. 5 and associated texts starting at col. 6, line 43 at seq.] configured to stylize the application object into a presentation object [e.g., HTML or WML object, col. 6, line 48], wherein the presentation object is stored in the memory of a third computer system [e.g., the client computer system, 515, Fig. 5], the presentation object comprising an object [e.g. the XML, XSL object] representation that encapsulates a visual appearance of the data in the application object [e.g., Fig. 5 and associated texts starting at col. 5, line 54 at seq.].

Appellants traverse the above rejections for one or more of the following reasons:

(1)   Helgeson fails to teach, disclose or suggest three discrete objects – a domain object, an application object, and a presentation object that are based on each other as claimed;

G&C 30566.129-US-01

6

(2)   Helgeson fails to teach, disclose or suggest a portable stylization process that is configured to stylize the domain object into an application object;

(3)   Helgeson fails to teach, disclose or suggest an application object that is an object representation of data in a domain object that is relevant for a particular computer application;

(4)   Helgeson fails to teach, disclose or suggest a portable stylization process configured to stylize an application object into a presentation object; and

(5)   Helgeson fails to teach, disclose or suggest a presentation object that encapsulates a visual appearance of data in an application object.

Independent claims 1, 13, and 25 are generally directed to the ability to stylize data in discrete portable steps. As used in the claims and set forth in the specification, "stylization" refers to the process wherein data is transformed from its pure/raw form to the final presentation desired by an application (see page 3, line 22- page 4, line 2). The portability of the stylization process (as claimed) allows stylization to be spread across multiple computers or tiers in a client-server environment.

The cited reference does not teach nor suggest various elements of Appellants' independent claims. Nor does the cited reference provide the flexibility offered by the present invention as claimed.

Helgeson merely describes a mechanism for managing data exchange among systems in a network. The systems and methods of the present mechanism translate data from a system specific local format to a generic interchange format object, and vice versa, with predefined stylesheets using generic components and a system specific service components which utilize a native application programming interface of the specific local system (see Abstract).

The Office Action relies on the Applications 507 depicted in FIG. 5 to teach the application object as claimed. However, as noted above, the claimed application object is an object representation of data in the domain object that is relevant for a particular computer application. In addition, the application object is created or stylized by a portable stylization process. However, as indicated in col. 6, lines 4-10, application layer 507 merely "provides objects and services particular to a given application." There is no provision in Helgeson that indicates that there are three separable objects as claimed (i.e., a domain object, application object, and presentation object).

G&C 30566.129-US-01

7

Further, Helgeson fails to indicate that a portable stylization process created the application object (as claimed). Instead, Helgeson merely indicates that an application layer provides application specific objects and services.

In response to the above arguments, the final Office Action refers to platform 501 to teach the process and Fig. 5, associated text starting at col. 6, line 26. Further, the Office Action equates the application object to the BDK 519 of Fig. 5 and the associated text starting at col. 6, line 32.

The BDK is described in col. 6, lines 32-42 and provides:

> BDK (Business Development Kit) Business applications server 519 is Saba's EJB compatibility layer. It extends the standard Java business component model with SABA-specific enhancements, such as improved security and caching, as well as providing an abstraction layer to improve portability between EJB servers. The BDK 519 defines the following base interfaces:
> ISabaEntityBean—The abstraction of a persistent object
>
> ISabaSessionBean—The abstraction of a transactional service

Thus, as described, the BDK is a kit that merely provides a set of interfaces. The BDK merely extends the standard Java business component model with enhancements for Hegelson's system platform architecture (SABA). However, there is no description, implicit or explicit that the BDK is an application object that comprises an object representation of the data in the domain object that is relevant for a particular computer application. Further, there is no description or suggestion, implicit or explicit, that the application object is produced as a result of a portable stylization process from the domain object.

In rejecting the claims, the Office Action provides that the domain object is equivalent to a business object that is stored in a meta-data store section (as a table) of the BDK. The Office Action then provides that platform model 501 (which contains the BDK 519 (see FIG. 5)) stylizes the object from the database into an application object. However, nowhere is there any description within the cited portion (or the remainder of Hegelson) that provides that the BDK creates an object specific for a particular computer application. Further, Hegelson completely fails to teach a portable process that stylizes the domain object (or using Hegelson's terms – a business object) into an application object. Instead, the BDK merely describes a kit with various defined interfaces. Such interfaces are not equivalent, implicitly or explicitly, to the claimed domain object, stylization process, or application object.

G&C 30566.129-US-01

8

The Office Action continues and rejects the second portable stylization process on the WDK server 523. The Office Action provides that the WDK builds a presentation object in the form of HTML or a WML object. The Office Action then changes its analysis and determines that the presentation object is an XML or XSL object representation. However, in analyzing the claims, one cannot merely ignore the various limitations. In the claims, the application object that is stylized from the domain object is then stylized into the presentation object. Further, the stylization into the presentation object is performed by a second portable stylization process. In Hegelson, the WDK is still part of the same BDK. Further, the WDK states that it generates web content into a variety of formats such as HTML and WML using web standards such as XML and XSL. However, there is no description of where the content is being generated from. Again, the claims provide that the presentation object is stylized from the application object that in turn is stylized from the domain object. In Hegelson, the description merely provides for generating web content. There is no description that Hegelson's web content is generated from an application specific object that in turn is generated from a domain object. In this regard, when analyzing the claim, the entire sequence (i.e., each and every element) of the claim and the links between the claims must be analyzed when attempting to apply Hegelson. Appellants submit that Hegelson fails to teach or allude to the above claim limitations when examined as a whole in accordance with MPEP 2141.01 and MPEP 2141.02.

The Office Action continues and provides that the presentation object is equivalent to an XSL object relying on col. 5, lines 54 et seq. However, contrary to that asserted by the Examiner, XSL is not an object but instead stands for extensible stylesheet language. In fact, an electronic search of Hegelson for the term "XSL object" provides no results whatsoever. Without even mentioning the terms XSL object, Hegelson cannot possibly teach an XSL object as asserted. Appellants note that the prior Office Action relied on XSLT stylesheets in col. 51, lines 31-34 to teach the presentation object. However, similar to an extensible stylesheet language and contrary to that stated in the prior Office Action, an XSLT stylesheet is not an object. Instead, an XSLT stylesheet is an extensible stylesheet language transformation (see col. 50, lines 24-25). As defined at http://www.techweb.com/encyclopedia/defineterm?term=xslt :

> XSLT is the processing component of the Extensible Stylesheet Language (XSL). XSLT is widely used to convert XML to HTML for screen display, but can be used to convert to PDF, another XML document or any other format. The conversion is accomplished with an XSLT processor, which transforms the input based on XSLT extensions of the XSL style sheet. XSL

G&C 30566.129-US-01

9

statements are also followed. The processor requires an XML parser to separate the XML elements into a tree structure which the processor manipulates. Path is a component of XSL that is used for identifying input, calculating numbers and manipulating characters. See XSL, DOM and SAX.

Such language clearly indicates that a stylesheet is not an object as claimed. Further, the output produced is an XML document or a document in another format and is not an object representation that encapsulates a visual appearance of the data in the application object. In this regard, not only is the XSLT not an object, but the XSLT is not based on an application object as claimed. Further, Helgeson also fails to indicate or use a portable stylization process that stylizes the application object into the presentation object.

In view of the above, Appellants assert that instead of producing a presentation object that encapsulates a visual appearance of data in the application object, Hegelson merely produces an XML file in accordance with an XSL stylesheet. Such a teaching does not teach, disclose, or suggest the creation or stylization of an object as claimed. Further, Hegelson also fails to teach that the resulting XML file is a visual appearance of data in an application object.

In addition, the Office Action appears to state that the presentation object is equivalent to a WML object. However, similar to an XSL stylesheet, WML merely stands for wireless markup language and does not render, refer to, or make up an object in any way, shape or form. Also similar to the term "XSL object", an electronic search of Hegelson for the term "WML object" provides no results whatsoever. Without even mentioning such words, Hegelson cannot possibly teach such an object.

Moreover, the various elements of Appellants' claimed invention together provide operational advantages over Helgeson. In addition, Appellants' invention solves problems not recognized by Helgeson.

The above arguments were submitted on June 21, 2004 in a Request for Reconsideration filed after the final Office Action (that was dated April 21, 2004). Various teleconferences were conducted on July 14, 2004 and July 20, 2004 with the Examiner subsequent to the filing of the Request during which the status of the case was requested by Attorney for Appellants, Jason. S. Feldmar, Reg. No 39,187, from the Examiner. No agreement was reached.

On July 21, 2004, an Advisory Action was mailed that provided the following:

> The amendment filed on June 21, 2004 changes the ground of arguments on record (e.g., the arguments under U.S. Code, 112 2nd rejection) which is admitted by applicant in a telephone interview

G&C 30566.129-US-01

10

held on July 14, 2004, thus the instant invention requires further consideration or search. In addition, examiner notes Rule 37 CFR 1.111(b) requires Applicant to "distinctly and specifically point out errors" in the examiner's action. Also, arguments or conclusions of Applicant cannot take the place of evidence. In re Cole, 51 CCPA 919, 326 F.2d 769.

Appellants respectfully disagree with the above assertions. Appellants did not admit that the grounds of the arguments on record were changed. Further, Appellants submit that the arguments made in the Request for Reconsideration (and set forth above) distinctly and specifically point out errors in the Examiner's action.

In view of the above, Appellants respectfully request that the Board reverse the rejections.

C. Dependent Claims

Appellants also note that in response to arguments with respect to the dependent claims asserted in Appellants' response to the first Office Action, the Examiner failed to address the arguments and merely reasserted the identical rejection in the final Office Action. Accordingly, Appellants reassert such arguments herein.

(i) Dependent claims 3, 5, 15, 17, 27, and 29 Are Patentable Over the Cited Art

As described above, these dependent claims all refer to the use of a stylization agent object 110 and a stylization context 204. In claims 3, 15, and 27, the stylization agent object stylizes 110 the application object 206 for a domain object 202 based on the stylization context 204. Further, the stylization context 204 identifies only the data relevant for the particular computer application (i.e., for the application object 206). Similarly, claims 5, 17, and 29 provide for a stylization agent object 110 stylizing a presentation object 210 from the application object 206 based on the stylization context 204. Further, the stylization context 204 identifies a visual appearance for the data in the application object 206. (See page 18, line 8 – page 19, line 8).

In rejecting these claims, the final Office Action provides:

> As to claims 15 and 17, Hegelson further discloses the stylization agent object configured to stylize the application and application objects for the domain object based on stylization context (e.g., the metadata, the Resource Description Format derived from a stylization BDK) [e.g., see Fig(s). 12-16 and associated texts; col. 114, lines 61-57, col. 115, lines 10-33].

The cited portion and Figs. 11-16 refer to the use of metadata that Hegelson specifically defines as "structured information about information, and is sued to identify, categorize, and locate

G&C 30566.129-US-01

11

resources of interest." (See col. 114, lines 61-63). The cited portions further refer to resource description format (RDF) as a "new XML-based standard for associating arbitrary metadata with any web resource" (see col. 114, lines 63-65). The text continues in col. 115, lines 1-3 and describes that RDF query language (RQL) is an XML-based query language for writing queries against RDF data. FIG. 13 describes the use of three different agents. Import agent 1300 creates and imports RDF descriptions and can generate metadata from web pages and business objects (see col. 115, lines 18-22). Match agents may conduct queries and determine whether metadata matches (see col. 115, lines 3-6 and 23-28). Delivery agents dispatch results of a query or match (see col. 115, lines 29-33). Fig. 14 describes a method for an information distributor or information distributor developer's kit (IDK), to query objects (e.g., SABA business objects) or implement a delivery service (see col. 115, lines 34-41). Fig. 15 continues and shows how to query objects. Wherein metadata mappings for objects are defined and an import agent is used to capture the metadata. Further, an RQL document is used so that a match agent can query the metadata (see col. 115, lines 42-51). Lastly, Fig. 16 illustrates how to implement a custom delivery service of Fig. 14. A RDF metadata mapping is defined for the objects and metadata of interest while an import agent captures the metadata. An RQL document is then created and used to query the metadata (e.g., through a match agent) and deliver the results of the query (e.g., through the delivery agent).

All of the above portions of Hegelson merely describe the use of metadata to perform a query and dispatch results. However, there is no description of a stylization agent object or any object that stylizes a particular application object based on data that is relevant for a particular computer application (i.e., that is encompassed within a stylization context) as claimed. Further, there is no description of a stylization agent object that stylizes a presentation object from an application object based on information that identifies a visual appearance for the data in the application object. Instead, Hegelson describes the use of metadata to perform a query. Querying an object and producing a result is not even remotely similar, nor does it teach, disclose, suggest, or allude to stylizing an object based on a stylization context. The claims provide specific limitations in this regard, and the Office Action fails to address such claim limitations. In view of the above, Appellants respectfully request that the rejection of the claims be reversed.

(ii)   Dependent claims 4, 16, and 28 Are Patentable Over the Cited Art

These claims further limit the application object 206 such that the application object 206 comprises business logic that provides functionality for a particular application (see page 18, lines 10-11). In rejecting this claim, the Office Action merely states that the claimed subject matter is the "nature property of a business application".

Appellants respectfully disagree. As claimed in the independent claims, the application object is an object representation of data in a domain object that is relevant for a particular application. The dependent claims now provide that in addition, the application object has business logic that provides functionality for a particular application. The claims do not provide that the application object is a business application itself. Instead, the claims provide that the application object has data relevant for a particular computer application and contains business logic for a particular computer application. Having a separate application object that contains such data and logic is not the "nature property of a business application".

In view of the above, Appellants respectfully request that the rejections be reversed.

(iii)   Dependent claims 6, 18, and 20 Are Patentable Over the Cited Art

As described above, these dependent claims provide for yet another object – a stylizer object (see page 19, lines 1-2). These dependent claims provide further specific limitations with respect to the stylizer object. The stylizer object has a data object that is either the domain object 202 or the application object 206 (see page 15, lines 9-12, lines 19-22). Additionally, the stylizer object has a stylization context object that has a stylization context 204 (se page 16, line 15-page 17, line 4). Further, the stylizer object has a stylization agent 110 and a mapping of the stylization agent 110 to a paired index of data objects and stylization context objects (see page 17, lines 5-14). In addition, the stylizer object has a stylize method that invokes the appropriate stylization agent 110 based on the mapping (see page 17, lines 13-14).

In rejecting these claims, the Office Action again relies on the information distributor kit (IDK) at 1100 of Fig. 11. Col. 113, lines 52-58 describe IDKs:

> FIG. 11 shows a structural overview of an IDK 1100 of the present invention. IDK 1100 is associated with a language 1102, such as RDF, for representing web metadata, a language for querying web metadata, and a set of APIs 1104 for defining information services based on what data is used, when and how a match is performed, and what is done with the results.

G&C 30566.129-US-01

13

The Office Action specifically provides that the claimed "selected domain object" is equivalent to the language 1102. The language 1102 is merely a resource description format language. In this regard, a language is not equivalent to an object in any way shape or form. Further, a language is not a data object as set forth in these dependent claims.

The Office Action further continues and compares the stylization context object to the RDF object described in col. 113, lines 41-58. However, contrary to that alleged in the Office Action, there is no mention of an RDF object in col. 113, lines 41-58. Instead, the text merely describes a language such as the resource description format (RDF) language and not an object as claimed.

The Office Action then equates the claimed stylization agent to the import agent, match agent, delivery agent in col. 7, lines 1-5 and col. 116, lines 21-64. As described above, Hegelson's import agent, map agent, and delivery agent do nothing more than assist with metadata queries. They do not stylize data as claimed.

The Office Action continues and asserts that the claimed mapping is equivalent to the mapping module (1600) of Fig. 16 and the RDF attribute/value pair indexing processing at col. 117, lines 35-46. Col. 117, lines 35-46 provides that the RDF consists of statements that pair a web resource (anything identified by a URL) with a property and a value. Further, the match agent compares one RDF description to a full set of RDF descriptions in a database. The match template specifies how a match is performed during the comparison.

The present claims provide for mapping a stylization agent to a paired index of data objects and stylization context objects. A web resource (i.e., anything identified by a URL) is not a data object nor a stylization context object. Further, a property and a value are also not equivalent, nor remotely similar to either a data object or stylization context. Thus, a URL-property-value mapping does not and cannot possibly teach the invention as set forth in the claims. In this regard, the claims specifically provide for a particular type of mapping. Hegelson completely fails to even remotely suggest such a mapping.

The claims further provide for invoking an appropriate stylization agent (that is part of the mapping) based on the mapping. The Office Action equates such a method invocation to the Match() method described in col. 130, lines 54-55. As described above, the match method merely compares metadata. There is no stylize method that invokes a particular/appropriate stylization

G&C 30566.129-US-01

14

agent based on a mapping. Instead, Hegelson's match method is always the same method that conducts a query of metadata. Such a teaching does not teach, disclose, suggest, or allude to the claimed invention.

(iv)   Dependent claims 7, 19, and 31 Are Patentable Over the Cited Art

As described above, these dependent claims further limit claims 6, 18, and 20 and provide that the paired index is a 2D array of stylization agents indexed by a data object class and a stylization context (see page 16, lines 3-7).

In rejecting these claims, the Office Action fails to address the individual claim limitations and merely groups the rejection with the rejections of claim 18. Under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." The Office Action fails to address the individual claim limitations and therefore fails to comply with the MPEP in setting forth a prima facie case of obviousness.

Appellants submit that Hegelson fails to teach an array as set forth in these claims. Further, the indexing set forth in the claims is also not even remotely described or suggested, implicitly or explicitly, in Hegelson.

In view of the above, Appellants respectfully request reversal of the rejections of these claims.

(v)   Dependent claims 8, 9, 20, 21, 32, and 33 Are Patentable Over the Cited Art

As set forth above, these claims provide the ability to cache the application object and presentation object (see Fig. 3, steps 310 and 318; page 18, lines 12-13, page 19, lines 7-8). In rejecting these claims, the Office Action relies on co. 47, line 44-col. 48, line 60. This portion of Hegelson describes the use of a Java hashtable that caches privilege for each business object in the system. As described above, a business object is not equivalent to either the claimed application object or presentation object. Further, the caching of a "privilege" for a business object is not even

G&C 30566.129-US-01

15

remotely similar to caching an entire application object or presentation object as claimed.

In view of the above, Appellants respectfully request reversal of the rejection of these claims.

        (vi)   Dependent claims 10-12, 22-24, and 34-36 Are Patentable Over the Cited Art

These dependent claims provide further limitations with respect to the particular domain entity. In this regard, these claims provide for a mechanical domain entity, an AEC domain entity, and a GIS domain entity respectively. In rejecting these claims, the Office Action merely states that such domain entities "is default nature of a domain object in an internet data exchange computer system".

Appellants respectfully disagree. An internet data exchange computer system is not similar to, nor does it remotely suggest a mechanical domain entity, AEC domain entity, or GIS domain entity. In this regard, the Office Action fails to rely upon or recite any reference whatsoever (or take Official Notice of such "facts") that establishes such a "default nature" or even the definition of a "internet data exchange computer system" that is used in the Office Action. Further, an electronic search of Hegelson for the term "internet data exchange" provides no results. Nowhere in Helgeson is there any reference to either a mechanical, AEC, or geographic information environments, implicitly or explicitly. In fact, separate electronic searches of Helgeson for the terms mechanical, AEC, and geographic provide no results whatsoever. Without even mentioning these terms, Helgeson cannot possibly teach these claims. Further, no art was cited that suggests an internet data exchange computer system by default nature provides for such domain fields.

Further, Appellants traverse the statement that the default nature of a domain object in an internet data exchange computer system includes the mechanical, AEC, and GIS entities. There is no foundation or support for such a conclusory statement. Also, the Office Action fails to cite any art for such a proposition.

IX.   CONCLUSION

In light of the above arguments, Appellant respectfully submit that the cited references do not anticipate nor render obvious the claimed invention. More specifically, Appellant's claims recite novel physical features which patentably distinguish over any and all references under 35 U.S.C. §§ 102 and 103. As a result, a decision by the Board of Patent Appeals and Interferences reversing the Examiner and directing allowance of the pending claims in the subject application is respectfully solicited.
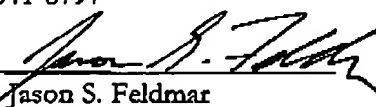
Respectfully submitted,

GATES & COOPER LLP

Attorneys for Appellant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: September 21, 2004

By:_____
Name: Jason S. Feldmar
Reg. No.: 39,187

JSF/

G&C 30566.129-US-01

17

PAGE 20/30 * RCVD AT 9/21/2004 4:35:23 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-1/2 * DNIS:8729306 * CSID:+13106418798 * DURATION (mm-ss):08-06